

Louis H. Weinstein (LW 7868)

Andrew J. Miller (AM 8160)

BUDD LARNER, P.C.

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Attorneys for Defendants and

Counterclaim Plaintiffs

Dr. Reddy's Laboratories, Ltd. and

Dr. Reddy's Laboratories, Inc.

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ASTRAZENECA AB, AKTIEBOLAGET	:	
HÄSSLE and ASTRAZENECA LP, KBI	:	07-CV-6790 (CM)(GWG)
INC. and KBI-E, INC.,	:	
Plaintiffs and	:	
Counterclaim Defendants,	:	
v.	:	
DR. REDDY'S LABORATORIES, LTD. and	:	ELECTRONICALLY FILED
DR. REDDY'S LABORATORIES, INC.	:	
Defendants and	:	
Counterclaim Plaintiffs .	:	

FOURTH DECLARATION OF HARRY G. BRITTAINE, Ph.D., FRSC
(Filed in Opposition to AstraZeneca's Motion To Strike)

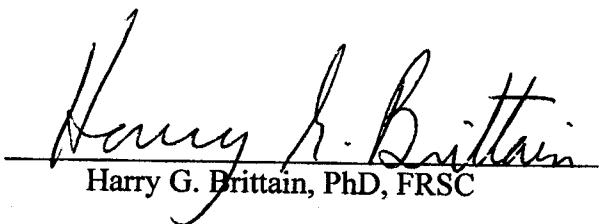
1. I am the same Harry G. Brittain who submitted the Second Declaration of Harry G. Brittain in this litigation, a Declaration which I prepared to support DRL's Motion for Summary Judgment.
2. I also submitted the Third Declaration of Harry G. Brittain in this litigation, a Declaration that I prepared to support DRL's Summary Judgment Reply.
3. I discussed my credentials and professional experience in paragraphs 1-8 of my Second Declaration. A summary of my credentials and professional experience and a copy of my curriculum vitae were attached to my Second Declaration as Exhibit A, and those documents are also attached to this Declaration as Exhibit A.
4. The statements I make in this Declaration are based on my personal knowledge.
5. In connection with this litigation, counsel for DRL asked me for my opinions regarding the alleged infringement of DRL's omeprazole magnesium product in view of United States Patents 5,900,424 and 5,690,960.
6. In coming to the opinions expressed in my Second Declaration, it was necessary for me to know certain facts concerning the processes about which I was being asked to opine. The facts that I wanted to know included factual details such as temperature, pressure, time, weight, reagents, equipment, and processing steps. These are the types of facts that an expert in my field would reasonably rely upon when forming an opinion about a pharmaceutical process.
7. In coming to the opinions expressed in my Second Declaration, I relied in part on the detailed facts regarding temperature, pressure, time, weight, reagents, equipment, and processing steps that were listed in the two summaries presented as part of DRL's Answer to Interrogatory No. 10. A copy of that Interrogatory Answer was attached at pages 9-16 of Exhibit 6 to the Second Declaration of Louis H. Weinstein that was filed in this litigation.

The opinions stated in my Second Declaration were directed to the processes described by the detailed facts listed in those two summaries.

8. The detailed facts regarding temperature, pressure, time, weight, reagents, equipment, and processing steps listed in those two summaries are the type of factual details that an expert in my field would reasonably rely upon in forming opinions as to whether a pharmaceutical process did or did not infringe patent claims directed to pharmaceutical manufacturing methods.
9. After submitting my Second Declaration I was informed by counsel for DRL that AstraZeneca had made an evidentiary objection to my Second Declaration on the ground that I should have based my opinion on the documents contained in the Drug Master File (DMF) and Abbreviated New Drug Application (ANDA) filed by DRL.
10. In preparing my Third Declaration I did review and rely upon the sections of DRL's DMF and ANDA which contained the facts that were relevant to the opinions stated in my Second Declaration.
11. As stated in paragraphs 4 and 8 of my Third Declaration, my opinions regarding DRL's bulk drug substance, DRL's finished drug product, and DRL's manufacturing processes remained the same following my review of the relevant portions of DRL's DMF and ANDA.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information and belief.

Signed,



Harry G. Brittain, PhD, FRSC

Date: September 3, 2008

CERTIFICATE OF SERVICE

I certify that on this 4th day of September, 2008, I caused a true and correct copy of the FOURTH DECLARATION OF HARRY G. BRITTAINE, Ph.D., FRSC (Filed in Opposition to AstraZeneca's Motion to Strike) to be served upon counsel for AstraZeneca in the following manner:

By ECF, E-MAIL AND FEDERAL EXPRESS

Errol B. Taylor, Esq.
Milbank, Tweed, Hadley &
McCloy LLP
1 Chase Manhattan Plaza
New York, New York 10005-1413
Facsimile: 212-530-5219



A handwritten signature in black ink, appearing to read "Errol B. Taylor". The signature is written in a cursive, flowing style and is positioned above a solid horizontal line.

EXHIBIT A

Curriculum Vitae

curriculum vitae-JIH_2

Jacob I. Haft, MD

office:

20 Prospect Avenue Suite 719
Hackensack, New Jersey 07601

306 Martin Luther King Boulevard
Newark, New Jersey 07102

Telephone: (201) 343-8505

Professional Experience:

July 1974 to Present
Disease)

Private practice of Medicine (Cardiovascular

July 1998 to December 1998

Medical Director, Cardiac Institute
St. Joseph's Hospital & Medical Center
Paterson, New Jersey

July 1974 to June 1998

Director, Department of Cardiology
St. Michael's Medical Center, Newark, New Jersey

July 1974 to present

Clinical Professor of Medicine
New Jersey College of Medicine & Dentistry

1987 to present
1987 to 1990

Professor of Medicine
Chief of Cardiology
Seton Hall University Post Graduate School of
South Orange, New Jersey

July 1969 to June 1974

Chief, Cardiology Section
Bronx VA Hospital, Bronx, New York

July 1971 to June 1974

Associate Professor of Medicine (Cardiology)
Mt. Sinai Medical School, New York, New York

July 1969 to June 1971

Assistant Professor of Clinical Medicine
Mt. Sinai Medical School, New York, New York

July 1969 to June 1975
(Clinic #19)

Principal Investigator, Coronary Drug Project

Degrees:

(AOA) - 1962

A.B. Harvard (cum laude) - 1958
M.D. College of Physicians & Surgeons, Columbia Univ

Post Doctoral Training:

1968 - 1969

Cardiology Fellowship, Peter Bent Brigham Hospital
Boston, Massachusetts
R. Gorlin, MD - Director

1965 - 1967	curriculum vitae-JIH_2 Assistant Chief Research, Cardiopulmonary Laboratory USPHS Hospital, Staten Island, New York A.N. Damato, MD - Director
1964 - 1965	Cardiology Fellowship, Mt. Sinai Hospital New York, New York C.K. Friedberg, MD - Director
1967 - 1968 Division	Senior Assistant Resident, First (Columbia) Bellevue Hospital, New York, New York
1963 - 1964	Junior Assistant Resident Beth Israel Hospital Boston, Massachusetts
1962 - 1963	Intern (Straight Medicine) Strong Memorial Hospital Rochester, New York

Military Service:

1965 - 1967 USPHS, Rank - Surgeon (Lieutenant Commander)
Military obligation fulfilled (Honorable Discharge)

Honors:

1961 Member Alpha Omega Alpha
1966 Original Research Award, Clinical Society, USPHS
1996 Archbishop McCarrick Medical Teaching Award

Certification:

Diplomate, National Board of Medical Examiners
Diplomate, American Board of Internal Medicine - 1968
Diplomate, American Board of Internal Medicine,
Cardiovascular Subspecialty Board - 1973
Diplomate, American Board of Internal Medicine,
Clinical Cardiac Electrophysiology Board - 1994
Diplomate, Certification Board of Nuclear Cardiology - 2001
Diplomate, Naspeexam - 1968

Licenses:

New York, New Jersey

Citizenship:

U.S.A.

Editorial Board:

Circulation, 1974 - 1977
Journal of Cardiovascular Ultrasound, 1981 - 1989
Contemporary Internal Medicine, 1989 - 1996

Societies:

American Heart Association's Council on Clinical Cardiology,
Fellow - 1973
Representative of Council for New Jersey 1977-1980,
1984-1987
American College of Physicians, Fellow 1971
American College of Chest Physicians, Fellow 1971
Scientific Program Committee, 1989 National Meeting
American College of Cardiology, Fellow 1973
Governor for New Jersey, 1979-1982
Steering Committee, New Jersey Chapter, 1989-1994

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Executive Committee, New Jersey Chapter, 1997-
American Federation for Clinical Research
North American Society or Pacing and Electrophysiology
(became Heart Rhythm Society)
Heart Rhythm Society - Fellow 2006
New York Heart Association
New Jersey Heart Association - Member
Board of Directors, 1975-1982
Chairman, Coronary Care Committee, 1977-1979
Nominating Committee, 1981-1982
President North Essex Division, 1992-1995
President Essex County Division, 1996-1997
Essex County Medical Society

State Services:
Committee, 1978-1986 New Jersey Commissioners of Health's Cardiac Advisory
New Jersey Cardiac Services Task Force, Department of
Health, May 1985 - June 1987
Services Committee, 1987 - 1993 New Jersey Department of Health, Commissioner's Cardiac
1982-1996 Blue Shield of NJ Multispecialty Advisory Committee,
Vice Chairman, 1990

Publications: See attached bibliography: >170 Papers, 11 Books, >220 Abstracts

curriculum vitae-JIH_2

Curriculum Vitae
Jacob I. Haft, MD

PAPERS:

1. Haft JI, Braverman L: Bilateral lymphoepithelioma of the tonsil. NEJM 271:199, 1964.
2. Kosowsky BD, Stein E, Lau SH, Lister JW, Haft JI, Damato AN: A comparison of the hemodynamic effects of tachycardia produced by atrial pacing and atropine. Am Heart J 72:594, 1966.
3. Lau SH, Stein E, Kosowsky BD, Haft JI, Lister JW, Damato AN: Atrial pacing and atrioventricular conduction in anomalous atrioventricular excitation (Wolff-Parkinson-White Syndrome). Am J Cardiol 19:354-59, 1967
4. Cohen SI, Lau SH, Haft JI, Damato AN: An esophageal electrode for recording arrhythmias. JAMA 200:901, 1967
5. Haft JI, Kosowsky BD, Lau SH, Stein E, Damato AN: Termination of atrial flutter by rapid electrical pacing of the atrium. Am J Cardiol 20:239-44, 1967
6. Cohen SI, Lau SH, Haft JI, Damato AN: Experimental production of aberrant ventricular conduction in man. Circulation 36:673-85, 1967
7. Haft JI, Lau SH, Stein E, Kosowsky BD, Damato AN: Atrial fibrillation produced by atrial stimulation. Circulation 37:70-74, 1968

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8. Lasser RP, Haft JI, Friedberg CK: Relationship of right bundle branch block and marked left axis deviation (with left parietal or peri-infarction block) to complete heart block and syncope. *Circulation* 37:429-37, 1968

9. Cohen SI, Young MW, Lau SH, Haft JI, Damato AN: Effects of reserpine therapy on cardiac output and atrioventricular conduction during rest and controlled heart rates in patients with essential hypertension. *Circulation* 37:738-41, 1968

10. Kosowsky BD, Haft JI, Lau SH, Stein E, Damato AN: The effects of digitalis on atrioventricular conduction in man. *Am Heart J* 75:736-741, 1968

11. Lau SH, Cohen SI, Stein E, Haft JI, Kinney M, Young M, Helfant R, Damato A: Controlled heart rates by atrial pacing in angina pectoris: a determinant of electrocardiographic ST depression. *Circulation* 38:711-20, 1968

12. Damato AN, Lau SH, Stein E, Haft JI, Kosowsky B, Cohen SI: Cardiovascular response to acute thermal stress (hot dry environment) in unacclimated normal subjects. *Am Heart J* 76:769-74, 1968

13. Haft JI, Damato AN: Measurement of collateral blood flow, after myocardial infarction in the closed-chest dog. *Am Heart J* 77:641-48, 1969

14. Cannon PJ, Haft JI, Johnson OM: Visual assessment of regional myocardial perfusion utilizing radioactive Xenon-133 and scintillation photography. *Circulation* 40:277-88, 1969

15. Lau SH, Cohen SI, Stein E, Haft JI, Rosen KM, Damato AN: P waves and P loops in coronary sinus and left atrial rhythms. *Am Heart J* 79:201-14, 1970

16. Helfant RH, Forrester JS, Hampton JR, Haft JI, Kemp HG, Gorlin R: Coronary Heart Disease: Differential Hemodynamics, Metabolic and Electrocardiographic effects in patients with and without angina pectoris during atrial pacing. *Circulation* 42:601, 1970

17. Young BK, Haft JI: Treatment of pulmonary edema with ethacrynic acid during labor. *Am J Obst & Gyn* 107:330, 1970

18. Scherlag B, Helfant RH, Haft JI: Electrophysiology underlying ventricular arrhythmias due to coronary litigation. *Am J Physiology* 219:1665, 1970

19. Johnson PM, Cannon PJ, Haft JI: Scintiphotography of regional myocardial blood flow in the normal and infarcted heart. *Amer J Roentgenology* 108:708-15, April 1970

20. Cohen SI, Lau SH, Haft JI: The intensity of the first heart sound in the Wolff-Parkinson-White Syndrome. *Mt. Sinai J of Med* 37:17-22, 1971

21. Haft JI, Herman MV, Gorlin R: Left bundle branch block: Etiologic hemodynamic and ventriculographic considerations. *Circulation* 43:279-87, 1971

22. Haft JI: Editorial: Assessment of functional significance of coronary artery lesions. *Am J Cardiol* 27:331-32, 1971

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conduction. Am J of Cardiol 32:794, 1973

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Am J of Cardiol 34:259, 1974

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73. Schiller MD, Levin AR, Haft JI, Engle MA, Ehlers KH, Klein AA: Electrophysiologic studies in sick sinus syndrome following surgery for D-transposition of the great arteries. J of Peds 91:891, 1977

74. Younan KY, Haft JI: Reversible anterior Q waves in the absence of myocardial infarction: Myocardial scintigraphic findings. J of Med Soc NJ 75(5):475-78, 1978

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76. Friedman HS, Zaman Q, Haft JI, Melendez S: Assessment of atrioventricular conduction in aortic valve disease. British Heart J 40:911, 1978

77. Haft JI: Current status of anti-platelet therapy. ACCEL. Vol. II, No. 1, Jan. 1979

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80. Gutman JA, Haft JI: Mediastinal tumor presenting as a new heart murmur. J Med Soc of NJ 76:364-66. 1979

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82. Haft JI, Gonnella GR, Kirtane JS, Anastasiades A: Correlations of the ear crease sign with coronary arteriographic findings. Cardiovascular Medicine 4:861-67, 1979

83. Schiller MS, Levin AR, Haft JI, Klein AA, Ehlers KH, Engle MA: Electrophysiologic studies in a child with concealed preexcitation syndrome. Cardiovascular Medicine 4(3):345-52, March 1979

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89. Agarwal SK, Haft JI: The atrial repolarization wave and spurious ST segment abnormalities. J of Med Soc of NJ 79:315-16, 1982

90. Agarwal SK, Malhotra S, Haft JI: Severe aortic regurgitation - an echocardiographic diagnosis. Arch Int Med 142:1625, 1982

91. Haft JI, Bachik M: Progression of coronary artery disease in patients with chest pain and normal or intraluminal disease on arteriography. Am Heart J 107:35-39, 1982

92. Arkel YS, Haft JI, Buxton M, Herbert S, Burghardt C, Williams R: Emotional arousal and platelet physiology: A review and some original contributions. J of Human Stress 19-27, 1982

93. Agarwal SK, Haft JI: Flail mitral leaflet: An echocardiographic diagnosis. J of Med Soc of NJ 79:404-08, 1982

94. Foerster JM, Haft JI, Parmley WM, Russell RO, Norman FW, Bulger JJ: Acute MI: Steps toward stabilization. Patient Care 16, 19:15-65, Nov. 15, 1982

95. Agarwal SK, Haft JI: Exit Block. J Nat Med Assoc 74:1026-8, 1982

96. Foerster JM, Haft JI, Parmley WM, Russell RO, Norman FW, Bulger JJ: Acute MI: Treatment of complications. Patient Care 17, 5:91-131, Feb. 15, 1983

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75:305-309, 1983

98. Haft JI, DeMaio SJ, Bartoszyk OB: Coronary arteriographic findings in symptomatic right bundle branch block. Am J Cardiology 53:770-73, 1984

99. Agarwal SK, Haft JI, Bachik M: Case report: Aneurysm of the descending aorta. NJ J of Med 81:211-13, 1984

100. Agarwal SK, Haft JI, Goldstein JE: Postmyocardial infarction rupture of the ventricular septum. J Med Soc of NJ 81:110-12, 1984

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103. Ambrose JA, Winters SL, Arora RR, Haft JI, Goldstein JE, Rentrop KP, Gorlin R, Fuster V: Coronary angiographic morphology in myocardial infarction: A link between the pathogenesis of unstable angina and myocardial infarction. JACC 6:1233-8, 1985

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111. Habbab MA, Haft JI: Characteristic pulsed Doppler findings in patients with flail mitral valve. Chest 91:571-75, April 1987

112. Habbab MA, Haft JI: Heparin resistance induced by intravenous nitroglycerin. Arch Int Med 147:857-60, May 1987

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117. Haft JI, Altieri JJ, Smith LG, Herskowitz M: Computerized axial tomography of the abdomen in the diagnosis of splenic emboli. Arch of Int Med 148:193-97, Jan. 1988

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122. Haft JI, Haik BJ, Goldstein JE, Brodyn N: Development of significant coronary artery lesions in areas of minimal disease. A common mechanism for coronary disease progression. Chest, Oct. 1988

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